Case 1:22-cv-00065-LJV-JJM Document 14 Filed 06/13/22 Page 1 of 2

Gregory M. Vinal, Esq. Jeanne M. Vinal, Esq.

VINAL & VINAL, P.C.
ATTORNEYS AT LAW

No-Fault Paralegal Tyler D. Myszka

Social Security Paralegal Julia B. Dietz

Sr. Litigation Paralegal / Office Manager Ien Griesbaum

June 13, 2022

VIA UPLOAD

Hon. Jeremiah J. McCarthy U.S. District Court Western District of New York 2 Niagara Square Buffalo, NY 14202

Re: Henley v. City of Buffalo, et al.

Docket No.: 1:22-cv-00065-LJV-JJM

Dear Judge McCarthy:

In advance of the pre-child this morning I have to report that there's no final answer yet from the criminal side. James McLeod, Esq. has been substituted as the criminal defense attorney and Mr. Henley has been declared competent to stand trial. Mr. McLeod met with Mr. Henley and also had a court conference in the criminal matter but both just occurred last week. No final decisions were made because they had several questions for me. All of this happened last week.

I did begin to answer these questions but I was hosting our 40th high school reunion on Friday evening and I had to attend to that responsibility and could not answer the questions and meet again with Mr. Henley in those hours.

We did consent to the adjournment of the pre-trial that was Thursday at the request of Mr. Lee. I so greatly appreciate the court not extending the matter out long but it not expected it to be on Monday. I do sincerely appreciate so much the fact that the court is working to move this case along and I sorely regret not being able to have a final answer today as I do not want to delay the case one day. However, the timing of the discussion with the client of options, the meeting with the criminal court, and then the questions of me on Friday, made it so I didn't have the chance to fully address the issues before this morning in a way that it could be meaningly transmitted to counsel and the client.

Thus, I would ask that Mr. Henley be given time to meet again with counsel after these questions are answered.

He has not been released just transferred back to Buffalo where he's now at the holding center. Therefore, access must be planned and coordinated and isn't just a phone call or asking him in.

Hon. Jeremiah J. McCarthy June 13, 2022 Page 2

Would it be possible to get a month to do this properly?

Thank you for your courtesies and I will await a response or call in at 10 at your choice Your Honor and Mr. Lee.

Very truly yours,

Jeanne M. Vinal

JMV/gmg

David Lee, Esq. cc.

Franklin Pratcher, Esq. Etido Udosoro, Esq.

Barbara Henley

Willie Henley